

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

IN RE:	)	
	)	
DAVID HUGH TILLEY	)	Case No. 16-33583-KLP
	)	Chapter 13
Debtor	)	

**MOTION TO APPROVE WAIVER OF REQUIREMENT  
TO COMPLETE POST-PETITION FINANCIAL MANAGEMENT  
COURSE AND CERTIFICATION PURSUANT TO 11 U.S.C. § 1328**

COMES NOW, the Debtor, by counsel, and as and for Debtor's Motion to Approve Waiver of Requirement to Complete Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on July 20, 2016.
2. All payments under the confirmed Chapter 13 Plan have been made to the Trustee.
3. The Debtor died on or about July 22, 2020 and is unable to complete a class on personal financial management, or execute a certification in accordance with 11 U.S.C. § 1328.

WHEREFORE, the Debtor, by counsel, respectfully requests that the Court enter an Order waiving the Debtor's requirement to complete the post-petition financial management course and certification Pursuant to 11 U.S.C. § 1328, and for such other relief as the Court may deem appropriate.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, VA 23218  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

DAVID HUGH TILLEY

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, VA 23218  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof, and a copy was mailed to the parties on the list attached hereto.

/s/ James E. Kane  
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
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DAVID HUGH TILLEY	)	Case No. 16-33583-KLP
	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION AND OF HEARING**

The above Debtor has filed a Motion to Approve Waiver of Requirement to Complete Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328 in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **May 26, 2021 at 10:00 a.m. at the U.S. Bankruptcy Court, Eastern District of Virginia, 701 East Broad Street, Room 5100, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 4, 2021

DAVID HUGH TILLEY

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

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/s/ James E. Kane  
James E. Kane

Label Matrix for local noticing

0422-3

Case 16-33583-KLP

Eastern District of Virginia

Richmond

Fri Apr 30 10:31:33 EDT 2021

Urban Financial of America, LLC.

Robertson, Anschutz &amp; Schneid, P.L.

6409 Congress ave Suite 100

Boca Raton, FL 33487-2853

Recovery Management Systems Corporation

25 SE 2nd Avenue, Suite 1120

MIAMI, FL 33131-1605

UST smg Richmond

Office of the U. S. Trustee

701 East Broad St., Suite 4304

Richmond, VA 23219-1849

WILMINGTON SAVINGS FUND SOCIETY, FSB

Robertson, Anschutz &amp; Schneid, P.L.

6409 Congress Ave., Suite 100

Boca Raton, FL 33487-2853

Wilmington Savings Fund Society,

Robertson, Anschutz, Schneid &amp; Crane LLC

10700 Abbotts Bridge Road, Suite 170

Duluth, GA 30097-8461

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

Capital One Bank (USA), N.A.

PO Box 71083

Charlotte, NC 28272-1083

(p)CAPITAL ONE

PO BOX 30285

SALT LAKE CITY UT 84130-0285

Debt Rec Sol

900 Merchants Concourse

Westbury, NY 11590-5142

Finance of America Reverse LLC

Celink

3900 Capital City Blvd

Lansing, MI 48906-2147

Finance of America Reverse, LLC.

Reverse Mortgage Solutions, Inc.

14405 Walters Road, Suite 200

Houston, TX 77014-1345

(p)INTERNAL REVENUE SERVICE

CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

PHILADELPHIA PA 19101-7346

IRS

P.O. Box 7346

Philadelphia, PA 19101-7346

Internal Revenue Service

P.O. Box 7346

Philadelphia, PA 19101-7346

RMS

P.O. Box 8630

Richmond, VA 23226-0630

Synchrony Bank

c/o of Recovery Management Systems Corp

25 S.E. 2nd Avenue, Suite 1120

Miami, FL 33131-1605

David Hugh Tilley

12706 Cottage Mill Terrace

Midlothian, VA 23114-3116

James E. Kane

Kane &amp; Papa, PC

1313 East Cary Street

P.O. Box 508

Richmond, VA 23218-0508

Suzanne E. Wade

341 Dial 877-996-8484 Code 2385911

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23226-3770

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Capital One Bank Usa N

15000 Capital One Dr

Richmond, VA 23238-0000

IRS

P.O. Box 21126

Philadelphia, PA 19114

(d)Internal Revenue Service

Kansas City, MO 64999-0002

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

End of Label Matrix  
Mailable recipients 19  
Bypassed recipients 3  
Total 22